

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

In re: Lindell Management LLC Litigation	Case No. 23-cv-1433 (JRT/DJF)  <b>ROBERT ZEIDMAN’S MOTION TO COMPEL RESPONSES TO POST-JUDGMENT DISCOVERY</b>
--	--

Robert Zeidman hereby moves the Court, pursuant to Federal Rule of Civil Procedure 37, for an order compelling Lindell Management LLC to produce documents and respond, in writing and without objection, to Mr. Zeidman’s post-judgment interrogatories and requests for production of documents served by Mr. Zeidman on February 22, 2024. Mr. Zeidman further requests the Court award him fees and costs related to having to bring this motion. This motion is based upon the accompanying Memorandum of Law.

DATED: April 26, 2024

**BAILEY & GLASSER LLP**

By: /s/ Cary Joshi  
Brian A. Glasser (admitted *pro hac*  
*vice*)  
Cary Joshi (admitted *pro hac vice*)  
1055 Thomas Jefferson St, Suite 540  
Washington, DC 20007  
T: (202) 463-2101  
F: (202) 463-2103  
[bglasser@baileyglasser.com](mailto:bglasser@baileyglasser.com)  
[cjoshi@baileyglasser.com](mailto:cjoshi@baileyglasser.com)

David E. Schlesinger (MN#  
0387009)  
4700 IDS Center  
80 South Eighth Street  
Minneapolis, MN 55402  
T: 612-256-3277  
F: 612-338-4878  
[schlesinger@nka.com](mailto:schlesinger@nka.com)

*Attorneys for Robert Zeidman*